THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION FILE NO. 5:21-CV-00225-BO

JUDITH KNECHTGES,)	
Pl v.	aintiff,	DECLARATI OF	ON
NC DEPARTMENT OF I SAFETY, et al.,	PUBLIC	ERIK A. HOO	KS
De	fendants.)	

- I, Erik Hooks, being competent to testify and having personal knowledge of the matters herein, hereby state as follows:
- 1. I am an adult over the age of 18, have never been adjudged incompetent, suffer from no mental or emotional illness, and make this declaration of my own free will, stating facts of which I have personal knowledge except as to those matters and things stated herein upon information and belief, and as to those, I believe them to be true.
- 2. In January 2017, I was appointed to serve as the Secretary of the North Carolina Department of Public Safety ("DPS") and served in that position until retiring in July 2021. I am the currently Deputy Administrator of the United States Federal Emergency Management Agency ("FEMA")
- 3. During my time in the position as Secretary, DPS had multiple agencies under its control, including the SBI, State Highway Patrol, National Guard, and Adult Corrections ("Prisons"), among others. In my role as Secretary of DPS, I was

responsible for overseeing the various agencies in my control. However, each agency had its own hierarchy of staff members that were responsible for the management of their respective agencies.

- 4. At the relevant time Reuben Young was serving as the Interim Chief Deputy Secretary for Adult Corrections and Juvenile Justice.
- 5. Reuben Young was the hiring manager for the Central Prison Hospital CEO position ("CEO Position) posted on August 7, 2018.
- 6. Upon information and belief, and as stated in his affidavit, Reuben Young decided to hire Chad Lovett for the CEO position based on the recommendation from the interview panel for the CEO Position, the application materials for all applicants and Dr. Wilson's memorandum.
- 7. Reuben Young obtained my approval, as Secretary of DPS, to hire Mr. Lovett for the CEO Position.
- 8. As Secretary, I was not directly involved in the hiring process for the CEO position but relied on Reuben Young as the hiring manager to provide me with a recommendation.
- 9. Upon information and belief, Mr. Lovett was offered the position and he accepted.
- 10. Judith Knechtges was not selected for the CEO Position because she was not the most qualified.
- 11. The decision not to hire Judith Knechtges for the CEO Position was not retaliatory or otherwise based on her reporting of: fraud, violations of law or regulation,

misappropriation of State resources, dangers to the public health and safety, gross mismanagement, a gross waste of monies, or gross abuse of authority.

FURTHER THE DECLARANT SAYETH NOT.

Pursuant to 28 U.S.C. § 1746(2), I verify under penalty of perjury that the foregoing Declaration is true and correct in substance and in fact to the best of my knowledge and belief.

Respectfully submitted this the 17th day of May, 2023.

Erik A. Hooks

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